

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	[PROPOSED]
	:	<u>Protective Order</u>
	:	
	:	22 Cr. 560 (CS)
FRANK BUTSELAAR,	:	
	:	
Defendant.	:	
	:	
	:	
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Whereas the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Benjamin Klein, Shiva H. Logarajah, and David A. Markewitz, seeks an order restricting the dissemination of material produced pursuant to the Jencks Act, 18 U.S.C. § 3500, and *Giglio v. United States*, 405 U.S. 150 (1972) (“3500 Material”) in connection with the trial in this matter scheduled to begin on November 4, 2024 (“Trial”);

Whereas, on or about May 30, 2024, the Government made a substantial production of 3500 Materials and has made rolling productions since that time on an attorney’s possession only basis;

Whereas, based on the consent of the defendant, by and through his attorneys Kerry Lawrence, Esq. and Diane Fischer, Esq., the Court finds that there is good cause for the requested relief;

IT IS HEREBY ORDERED that the defendant and his defense team -- including but not limited to Mr. Lawrence and Ms. Fischer, and any U.S.-based paralegals, investigators,

experts, consultants, and interpreters working for the defendant -- shall not transport or transmit, including through telephonic dissemination, the content of any of the 3500 Material, outside of the United States;

IT IS FURTHER ORDERED that the defendant and his defense team shall not show or disseminate any of the 3500 Material (or its content) to anyone other than the defendant or any member of his defense team;

IT IS FURTHER ORDERED that the defendant and his defense team shall return to the Government, or destroy, all of the 3500 Material at the close of the Trial or when any appeals have become final; and

IT IS FURTHER ORDERED that defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:



HONORABLE CATHY SEIBEL
United States District Court
Southern District of New York

8/29/24

Date